

JUL 24 2007

Remarks

The amendment to page 8 changing [Display] to Database is supported by lines 18 and 33 on page 7 and by FIGs. 3 and 4.

Claims 1, 4-16, 19-31, 34, 45 and 48 remain in this application. Claims 2, 3, 17, 18, 32, 33, 35-44, 46, 47 and 49-58 are being canceled. Claims 59 and 60 are being added.

Claim Rejection - 35 USC §112

In paragraph two of the Office Action the Examiner rejected claim 2 under 35 USC §112, second paragraph, on the ground that the limitation "said reorder database" recited in line 2 has insufficient antecedent basis in the claim.

Applicants respectfully traverse. In claim 2 as filed "said reorder database" is recited in line 4, not line 2. Line 2 recites "providing a reorder database" which supplies antecedent basis for the limitation to which the Examiner objected. Applicants respectfully request that the Examiner withdraw this rejection.

Claim Rejections - 35 USC §102

In paragraph four the Examiner rejected claims 1-8, 10, 11, 13, 16-23, 25, 26, 28, 31-38, 40, 41, 43, 45-52, 54, 55 and 57 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,307,549 to King et al. The Examiner indicated that as for (all of the independent) claims 1, 16, 31 and 45, King teaches a process for reordering items retrieved from a database... and assigning a dynamic reordering frequency count to words selected by the user from said list (C.13. lines 53-67, C.14. lines 1-13).

The Examiner indicated that as for claims 2, 17, 32 and 46, King teaches Claim 1 plus providing a reorder database (C.13. lines 53-55); and wherein said assigning step inserts selected words and their associated reordering frequencies into said reorder database (C.14. lines 1-13).

In response to the rejections of claims 1 and 2 Applicants are amending claim 1 to incorporate limitations of claims 2 and 3, which are canceled, and the further limitation that the User database is separate from the Linguistic (vocabulary) database. The amendments to claim 1 (and claim 16) are supported in the Specification at page 7 line 3, page 8 lines 21-27 and page 13 lines 17-18. As the rejection might be applied to amended claims 1 and 16, Applicants respectfully traverse.

King does not insert words into a separate reordering database. He inserts frequency counts as a field ("reordering database") accompanying the words in his vocabulary database. King suggests providing in his node data structure 400 a "frequency of use field" which the system could change "to reflect the frequency with which a user used certain objects within the vocabulary module during representative text entry." (Col. 14 lines 1-13). The node data structure 400 is part of King's vocabulary module 110 (Col. 11 lines 63-65) which, to be changeable, must be non-fixed.

King does not suggest "providing a user database *separate* from the LDB which... includes a reorder database that stores database object numbers" as recited in amended claim 1 (emphasis added). The reorder database being separate from the LDB advantageously permits the LDB to be fixed in the present invention whereas, to include updatable frequency of use fields, King's vocabulary module 110 must be non-fixed.

The other pending rejected independent claim, claim 16, is amended the same as claim 1. New independent claim 59 also recites the limitation that the User database is separate from the Linguistic (vocabulary) database, with the further limitation that the Linguistic database is fixed, as supported in the Specification at page 8 line 13. The previously remaining independent claims 31 and 45 now depend from claims 1 and 16 respectively. Applicants respectfully submit that these limitations render each of the

independent claims 1, 16 and 59 patentably distinct over King, and request that they be allowed.

Claims 4-15, 31, 34, 45 and 48 depend from claim 1, and claims 19-30 depend from claim 16, and therefore are allowable for at least the same reasons as independent claims 1, 16 and 59. Applicants request that the Examiner withdraw the rejection, and allow all, of the pending dependent claims.

On page 4 the Examiner indicated that as for claims 4, 19, 34 and 48 (Applicants respectfully propose claims 4, 19, 35 and 49), King teaches that said assigning step inserts a first ordered word... and a non first ordered word into said reorder database (C.14. lines 1-13)... if the user has selected the non first ordered word for the first time... (C.22. lines 1-10-his frequency use of custom vocabulary).

Applicants respectfully traverse. King does not insert a non-selected first ordered word as recited in Applicants' amended claims 4 and 19.

Beginning on page 4 the Examiner indicated that as for claims 5, 20, 35 and 49 (Applicants respectfully propose claims 5, 20, 36 and 50), King teaches that the first ordered word in said list loses its position if the non first ordered word is selected by the user a predetermined number of times, and wherein the non first ordered word is then assigned a higher frequency value than the first ordered word (C.14. lines 1-14).

Applicants respectfully traverse. King does not say anything about a number of times a (non first ordered or otherwise) word might be selected for its frequency value to be changed, or by how much it would be changed.

On page 5 the Examiner indicated that as for claims 6, 21, 36 and 50 (Applicants respectfully propose claims 6, 21, 34 and 48), King teaches the process of Claim 4, wherein all non first ordered words entered into said reorder database are initially

assigned equal reordering frequencies (C.14. lines 1-14-inherent to frequency count, wherein all objects must start at a frequency of 0).

Applicants respectfully traverse. On the contrary, King may assign non-zero, and not necessarily equal, frequency values to non-first ordered words: King teaches that "...preferably the default presentation order is by decreasing frequency of use in a representative corpus of usage." (Col. 16 lines 9-11) and "If the most commonly used word presented to the user at the top of the selection list is not the desired word, the user presses the select key again to advance from the most frequently used word to the second most frequently used word, and again to advance to the third most frequently used word, and so on. By repetitively pressing the select key, the user may therefore select the desired word from the selection list." (Col. 3 lines 26-33). Thus the second word has a higher frequency than does the third, and these can be assigned as initial reordering frequencies rather than zeroes. Applicants respectfully request withdrawal of the rejection and allowance of claims 6 and 21.

Beginning on page 5 the Examiner indicated that as for claims 10, 25, 40, and 54, King teaches... if the free space in said reordering database [falls] below a predetermined threshold... then removing words that have reordering frequencies below a predetermined threshold from said reordering database (C.16. lines 13-17).

Applicants respectfully traverse. King does not say anything about removing words from a reordering database. The sentence (col. 16 lines 13-17) cited by the Examiner says "[words] that fall below a predetermined minimum frequency of use may be omitted from the initial *display* of the selection list." (emphasis added). Continuing, "The omitted objects may be later added to the selection list when the user scrolls beyond the end of the displayed list" (col. 16 lines 17-19) so they could not have been removed from the database.

On page 6 the Examiner indicated that as for claims 11, 26, 41 and 55, King teaches the process of Claim 10, wherein said checking step removes user defined

words having reordering frequencies below the predetermined threshold after other words having reordering frequencies below the predetermined threshold from said reordering database (ibid-see claim 10, and Fig. 8F-his user define word, the Examiner notes user defined words, any word, would be inherently, per the invention, be removed, if below the threshold).

Applicants respectfully traverse. First, King does not remove words from a reorder database. Second, it is not inherent that "any" word below a threshold would be removed. Claim 10 removes user defined words after other words.

On page 6 the Examiner indicated that as for claims 13, 28, 43 and 57, King teaches... resolving reordering frequency collisions...if two words have the same reordering frequency by ordering the word having a higher ordering in said linguistic database first (C.6. lines 5-11). Applicants respectfully propose Col. 16 lines 3-11:

the priority between the objects from the same vocabulary module is therefore resolved if the object list contains multiple entries. Within the search results from each vocabulary module, the objects that match a particular keystroke sequence are also given a priority that determines their relative presentation with respect to each other. As noted above, preferably the default presentation order is by decreasing frequency of use in a representative corpus of usage.

King "resolves priorities" but does not mention the possibility of collisions or even of words having the same reordering frequency. The words' frequencies in a "representative corpus of usage" are presumably already ranked.


JUL 24 2007

Conclusion

Applicants respectfully request that a timely Notice of Allowance be issued in this case.

Should the Examiner find it helpful, he or she is encouraged to contact the Applicants' attorney Michael A. Glenn at (650) 474-8400.

Respectfully submitted,



Michael A. Glenn
Reg. No. 30,176

Customer No. 22,862